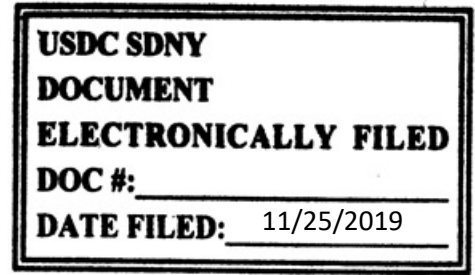


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November 22, 2019

VIA ECF AND E-MAIL

Hon. Katharine H. Parker, U.S.M.J.
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street, Room 1950
New York, New York 10007

Re: *Veerappan Subramanian v. Lupin, Inc.*, Civ. Action No. 17-5040 (RA)(KHP)

Dear Judge Parker:

Pursuant to Your Honor's Rules, Plaintiff and Counterclaim Defendants (collectively, "Sellers") request that the Court accept under seal Sellers' Letter Motion pursuant to L. Civ. R. 37.2 and **Exhibits A, B, C, and G** to that letter motion. A redacted version of the letter motion and Exhibits D, E, and F thereto were filed via ECF earlier today. [Dkt. # 271]

Sellers; letter motion makes reference to certain confidential information with respect to the *Euticals* Action, which has been redacted from the publicly filed version of the letter. The information redacted from the letter motion is of a kind that has not been historically open to the press and the general public, and, thus, should be filed under seal in accordance with the experience and logic test. *See Bernstein v. Bernstein Litowitz Berger & Grossman LLP*, 814 F.3d 132 (2d Cir. 2016).

Exhibit A consists of Lupin's Objections and Responses to Sellers' Fourth Set of Document Requests, which Lupin has designated as confidential. Exhibits B and C consist of "meet and confer" correspondence between counsel that refers extensively to those discovery responses. Finally, Exhibit G is an excerpt from the deposition of Mary Furlong, Lupin's executive vice president, which Lupin also designated as confidential. In order to respect Lupin's confidentiality designations of the foregoing discovery material, we request that the Court accept these exhibits under seal.

In accordance with your Honor's Rules, Sellers have submitted an unredacted version of their letter motion and Exhibits A, B, C, and G to the Court by email.

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Hon. Katharine H. Parker, U.S.M.J.
November 22, 2019

Page 2

Thank you for your consideration of this matter.

Respectfully,

s/ Jason L. Jurkevich

Jason L. Jurkevich

cc: All Counsel of Record (via ECF and email)

APPLICATION GRANTED

11/25/2019

Katharine H. Parker
Hon. Katharine H. Parker, U.S.M.J.